

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JENNIFER HOUGH,

Plaintiff,

-- against --

ONIKA TANYA MARAJ, AKA (“NICKI
MINAJ”) and KENNETH PETTY, AKA
(“ZOO”).

Defendants.

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Case No. 21-cv-04568-ENV-JRC

**DECLARATION OF
JUDD BURSTEIN**

JUDD BURSTEIN declares under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct.

1. I am a member of the Bar of this Court and the sole shareholder of Judd Burstein, P.C., attorneys for Defendant Onika Tanya Maraj (“Defendant”)
2. I submit this Declaration in opposition to Plaintiff Jennifer Hough’s (“Plaintiff”) motion for a default judgment against Defendant.
3. The purpose of this Declaration is to provide some of the facts and annex documents which are discussed in the accompanying Memorandum of Law submitted in support of Defendant’s opposition to Plaintiff’s motion seeking a default judgment against Defendant.
4. Annexed hereto as Exhibit A is a true and accurate copy of an email exchange which I had with Plaintiff’s counsel on October 13, 2021.
5. Annexed hereto as Exhibit B is a true and accurate copy of an email exchange which I had with Plaintiff’s counsel on October 21-22, 2021.
6. Annexed hereto as Exhibit C is a redacted true and accurate copy of the results of a Lexis search which I conducted in an effort to ascertain whether the text message annexed as

Exhibit B to the December 30, 2021 Declaration of Defendant was sent to Defendant by Plaintiff. It confirmed that the phone number from which the text message was sent belonged to Plaintiff. I have provided opposing counsel with the unredacted copy of the Lexis search, as well as an unredacted copy of the text message annexed as Exhibit B to Defendant's December 30, 2021 Declaration.

7. Annexed hereto as Exhibit D is a chart which I created. It compares material allegations made in the Amended Complaint to prior statements made by Plaintiff.

8. Exhibit E hereto is a copy of an envelope with an electronic postage stamp (redacted to hide the street address of my home) which I created on my Endicia.com account. Endicia is a company, authorized by the United States Postal Service, which allows consumers to create electronic postage stamps. I created Exhibit E hereto for the purpose of determining whether the envelope annexed as Exhibit A to the November 8, 2021 Declaration of Plaintiff's process server, Robert Diaz, (Dkt. Nos. 32-3 and 32-4) was in fact sent by Mr. Diaz.

9. As the Court can see from reviewing Exhibit E hereto, the electronic postage stamp on envelopes created on the Endicia website indicates the sender's local post office. There is no apparent reason for someone in California to mail documents with an Endicia postage stamp showing a post office located in Newark, New Jersey.

10. Annexed hereto as Exhibit F is a true and accurate copy of the March 4, 2021 article from *The Daily Beast*, entitled "Nicki Minaj and Husband Kenneth Petty's Campaign to Silence His Sexual Assault Victim."

Executed on December 31, 2021 in Fairfield County, Connecticut.

A handwritten signature in black ink, appearing to read 'Judd Burstein', is written over a horizontal line.

JUDD BURSTEIN